

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET NO. 2020- -C

IN RE:)	
Petition of MCImetro Access Transmission Services)	
Corp. d/b/a Verizon Access Transmission Services)	PETITION
for Review of SOMOS' Denial of Application for)	
Numbering Resources)	
)	

MCImetro Access Transmission Services Corp. d/b/a Verizon Access Transmission Services (Verizon Access), pursuant to S.C. Code Ann. §58-9-140 (2015), and in accordance with S.C. Code Ann. Regs. 103-825 (2012), hereby submits its Petition requesting that the Commission review the Pooling Administrator's denial of Verizon Access' application for six contiguous thousand blocks of telephone numbers (Thousand Blocks) in the Greenville, South Carolina rate center, overturn that decision, and order that six contiguous Thousand Blocks be assigned to Verizon Access. In support of its Petition, Verizon Access would respectfully show, and request relief from the Commission, as follows:

1. Verizon Access is a competitive local exchange carrier that provides local exchange service and exchange access service in South Carolina pursuant to a certificate issued by this Commission.

2. Verizon Access' customers include large businesses and government agencies that use direct inward dialing (DID) arrangements to obtain telephone service for their employees at one or more locations.

3. A business customer in the health care industry is expanding its technology footprint by expanding its current facilities and therefore needs to add

additional lines to its current SIP Network. The customer selected Verizon Access as its service provider and requested 6,000 contiguous DID telephone numbers in the 864 NPA in the Greenville, South Carolina rate center. Using consecutive telephone numbers facilitates the installation and management of DID arrangements, so the customer is requesting an NXX Thousands Block assignment preference of 864-XXX-4000 thru 864-XXX-9999 to ensure no telephone number duplication occurs within its current phone system. The customer states that if Verizon Access is unable to procure the 6,000 contiguous telephone numbers it will negatively impact the customer's ability to implement the desired dial plan and adversely affect its ability to serve its newly expanded patient base. A copy of the customer's letter explaining the circumstances is attached as Exhibit 1.

4. Because Verizon Access does not have 6,000 consecutive DID numbers in its inventory, it applied on January 14, 2020 to the Pooling Administrator, SOMOS, for six Thousand Blocks in the Greenville, South Carolina rate center. Verizon Access' application and MTE's calculation is attached as Exhibit 2.

5. SOMOS denied Verizon Access' request the same day it was submitted because Verizon Access did not meet either of the FCC criteria that SOMOS applies -- number utilization or months-to-exhaust. SOMOS' denial is attached as Exhibit 3.

6. The FCC has delegated authority to the Commission to address SOMOS' denial of a request for numbering resources, stating that "[w]e agree . . . that a safety valve mechanism should be established, and we delegate authority to state commissions to hear claims that a safety valve should be applied when the . . . Pooling Administrator

denies a specific request for numbering resources.”¹ Moreover, the FCC has determined that “a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier’s inability to satisfy a specific customer request.” Specifically, states “may grant requests for customers seeking contiguous blocks of numbers.”² Based on this authority, the Commission has issued previous orders addressing denials by the Pooling Administrator.³

7. Verizon Access’ request for six Thousand Blocks to meet its customer’s request for 6,000 contiguous numbers fits squarely within the framework established by the FCC for “safety valve” requests that the Commission is authorized to grant. Verizon Access respectfully requests that the Commission direct SOMOS to assign six Thousand Blocks for the Greenville, South Carolina rate center so that it can satisfy its customer’s request.

WHEREFORE, having fully set forth its Petition, Verizon Access respectfully requests that the Commission (1) review SOMOS’ decision to deny Verizon Access’ request for additional numbering resources, (2) overturn that decision, (3) direct SOMOS to assign Verizon Access six Thousand Blocks in the Greenville, South Carolina rate center, and (4) grant Verizon Access such other and further relief as may be just and proper.

[SIGNATURE PAGE FOLLOWS]

¹ *Numbering Resource Optimization*, Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, 17 FCC Rcd 146 ¶ 61(2001).

² Id. ¶ 64.

³ See, e.g., *Petition of MCI Metro Access Transmission Services Corporation d/b/a Verizon Access Transmission Services . for Review of SOMOS’s Denial of Application for Numbering Resources*, Order Reversing SOMOS Decision, Docket No. 2019-305-C, Order No. 2019-705 (2019).

Respectfully Submitted,

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This 30th day of January, 2020